

Message

From: Blankinship, Amy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D180951A173741FA9A76A3A3A3EB6794-BLANKINSHIP, AMY]
Sent: 9/19/2019 12:17:00 PM
To: Lin, James [lin.james@epa.gov]; Wente, Stephen [Wente.Stephen@epa.gov]; Arnold, Elyssa [Arnold.Elyssa@epa.gov]
CC: Federoff, Nicholas [Federoff.Nicholas@epa.gov]
Subject: RE: aldicarb EDWC numbers with citrus uses

Unlike methomyl which is registered on many crops, s

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Amy

From: Lin, James <lin.james@epa.gov>
Sent: Thursday, September 19, 2019 8:08 AM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Wente, Stephen <Wente.Stephen@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>
Cc: Federoff, Nicholas <Federoff.Nicholas@epa.gov>
Subject: RE: aldicarb EDWC numbers with citrus uses

Looking at the experience from methomyl, we need more detail use info from BEAD.

Deliberative Process / Ex. 5

Thanks much.

Jim

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Thursday, September 19, 2019 7:33 AM
To: Lin, James <lin.james@epa.gov>; Wente, Stephen <Wente.Stephen@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>
Cc: Federoff, Nicholas <Federoff.Nicholas@epa.gov>
Subject: RE: aldicarb EDWC numbers with citrus uses

Hi everyone,

I spoke with Debra Rate this morning about aldicarb.

Deliberative Process / Ex. 5

follow-up from that meeting. However, RD would like us and HED to continue to try to refine the DW and food numbers and is looking for something concrete in a couple of months. For us that would be exploring the PCA and which layers to include, and then possibly pH refinements (spatially). BEAD is also working on projecting PCT numbers that HED can use for their dietary assessment.

Debra indicated that she will be trying to schedule a DD briefing in the next couple of months, so be on the lookout for that. Jim-I let her know the dates you will on leave both in Oct and Nov.

Thanks,
Amy

From: Blankinship, Amy
Sent: Thursday, September 12, 2019 3:37 PM
To: Lin, James <lin.james@epa.gov>; Wente, Stephen <Wente.Stephen@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>
Subject: RE: aldicarb EDWC numbers with citrus uses

Thanks everyone. Elyssa can you send this to the aldicarb HED/RD team? If it is tomorrow morning that is okay.

Amy

From: Lin, James <lin.james@epa.gov>
Sent: Thursday, September 12, 2019 3:35 PM
To: Wente, Stephen <Wente.Stephen@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>
Subject: aldicarb EDWC numbers with citrus uses

Please pass on to HED.
Thanks much.

From: Lin, James
Sent: Thursday, September 12, 2019 3:32 PM
To: Wente, Stephen <Wente.Stephen@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>
Subject: RE: aldicarb GW numbers

Thanks much for the edits and format.
It looks a lot better.

From: Wente, Stephen <Wente.Stephen@epa.gov>
Sent: Thursday, September 12, 2019 3:30 PM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Lin, James <lin.james@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>
Subject: RE: aldicarb GW numbers

Here are the edits that I was proposing. Is this OK, Jim?

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Wednesday, September 11, 2019 12:25 PM
To: Wente, Stephen <Wente.Stephen@epa.gov>; Lin, James <lin.james@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>
Subject: RE: aldicarb GW numbers

Hi,

Per our discussion, since it will take a bit to look into the PCA in terms of what is appropriate, I suggest we move the table and we can add

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Correct me if I'm wrong or if other wording would be better.

Also, I would add "Draft – internal, deliberative" to the top of the document.

Steve – don't worry about looking at it tonight.

Amy

From: Wente, Stephen <Wente.Stephen@epa.gov>

Sent: Wednesday, September 11, 2019 12:16 PM

To: Lin, James <lin.james@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>

Subject: RE: aldicarb GW numbers

I can take a look at it tonight.

From: Lin, James <lin.james@epa.gov>

Sent: Wednesday, September 11, 2019 12:06 PM

To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Wente, Stephen <Wente.Stephen@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>

Subject: RE: aldicarb GW numbers

I will wait for Steve to comment.

Deliberative Process / Ex. 5

Thanks much.

Jim

Use	Max. Single App. Rate (lbs a.i./A)	Max. Annual App. Rate (lbs a.i./A)	Min. App. Interval (d)	App. Method	Labeled Use States
Cotton	1.05 (At Planting) 0.75 (Side Dress) 2.1 (Side Dress)*	1.8 3.15*	21	at-plant: in furrow and T- band post-emergent: in furrow	U.S. *[CA only]
Dry Beans	2.1	2.1	0	at-plant: in furrow	CO, ID, MI, OR, WA only
Peanuts	1.05 (At Planting) 1.5 (Post-Emergence)	2.55	14	at-plant: in furrow, incorporated band or T- band post-emergent: banded over foliage	U.S. [Split application only in AL, FL, GA, NC, OK, TX, VA]
Soybeans	1.05	1.05	0	at-plant: in furrow or T- band	GA, NC, SC, VA only
Sugar Beets	4.95 (At Planting) 3.0 (Post-Emergence) 4.05 (Post-Emergence) 2.1 (At Planting)* 2.1 (Side Dress)*	4.95 4.2*	14	at-plant: in furrow, incorporated band or T- band post-emergent: in furrow, incorporated side band or side dress	[CO, ID, MT, NE, OR, WA, WY only] *[CA only]
Sweet Potatoes	3.0	3.0	0	pre-plant or at-plant: band covered by hilling	LA, MS only

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Wednesday, September 11, 2019 11:53 AM
To: Lin, James <lin.james@epa.gov>; Went, Stephen <Wente.Stephen@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>
Subject: RE: aldicarb GW numbers

Thanks Jim. Question

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Thanks,
Amy

From: Lin, James <lin.james@epa.gov>
Sent: Wednesday, September 11, 2019 8:31 AM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Went, Stephen <Wente.Stephen@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>
Subject: RE: aldicarb GW numbers

Please see attached EDWC results cover both SW and GW.
Thanks much.

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Wednesday, September 11, 2019 7:25 AM
To: Lin, James <lin.james@epa.gov>; Went, Stephen <Wente.Stephen@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>
Subject: RE: aldicarb GW numbers

Hi,

For this preliminary needs for HED, the map below is likely enough. We would need to make sure Kurt has time and approval to make the map for us. I can talk to Lee and ask if his group can help out.

Thanks everyone for taking the time to pull this information together.

Amy

From: Lin, James <lin.james@epa.gov>
Sent: Wednesday, September 11, 2019 7:23 AM
To: Went, Stephen <Wente.Stephen@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>
Subject: RE: aldicarb GW numbers

Thanks much, Steve, for this pH information.
Please ask Kurt to get a Florida pH map for us.

Jim

From: Wente, Stephen <Wente.Stephen@epa.gov>

Sent: Wednesday, September 11, 2019 7:20 AM

To: Lin, James <lin.james@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>

Subject: RE: aldicarb GW numbers

Here is a groundwater pH map for the continental US. (If you want to present groundwater numbers by pH it might help to have a map, since there is a range across Florida.) Attached is the raw data, so if anyone has GIS on their computer (I got Kurt Pluntke to make this map for me), they could create a map that focuses in on Florida. I will be in training and presenting at the PFTTT at 2pm (be there or be square). Would people want a map? I can talk to Kurt? Note that Jerrett



could do it, but he is in training with me.

From: Lin, James <lin.james@epa.gov>

Sent: Tuesday, September 10, 2019 9:39 AM

To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Wente, Stephen <Wente.Stephen@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>

Subject: RE: aldicarb GW numbers

Hi, All:

Please comment on this draft, so it is good to HED.
Thanks much.

Jim

From: Blankinship, Amy <Blankinship.Amy@epa.gov>

Sent: Tuesday, September 10, 2019 9:23 AM

To: Lin, James <lin.james@epa.gov>; Wente, Stephen <Wente.Stephen@epa.gov>; Arnold, Elyssa

<Arnold.Elyssa@epa.gov>

Subject: RE: aldicarb GW numbers

Hi Jim,

Thanks for these numbers. Would you mind putting all this information (what you have in the email string below) into a Word document so we can forward to HED?

Thanks,
Amy

From: Lin, James <lin.james@epa.gov>

Sent: Thursday, September 05, 2019 2:33 PM

To: Wente, Stephen <Wente.Stephen@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>

Subject: RE: aldicarb GW numbers

Previous DWA (098301_427697_DWA_06-17-15.doc) show the use table as below:

Use	Max. Single App. Rate (lbs a.i./A)	Max. Annual App. Rate (lbs a.i./A)	Min. App. Interval (d)	App. Method	Labeled Use States
Cotton ^C	1.05 (At Planting) 0.75 (Side Dress) 2.1 (Side Dress)*	1.8 ^A 3.15* ^A	21	at-plant: in furrow and T- band post-emergent: in furrow	U.S. *[CA only]
Dry Beans	2.1	2.1 ^A	0	at-plant: in furrow	CO, ID, MI, OR, WA only
Peanuts ^B	1.05 (At Planting) 1.5 (Post-Emergence)	2.55 ^A	14	at-plant: in furrow, incorporated band or T- band post-emergent: banded over foliage	U.S. [Split application only in AL, FL, GA, NC, OK, TX, VA]
Soybeans	1.05	1.05 ^A	0	at-plant: in furrow or T- band	GA, NC, SC, VA only
Sugar Beets ^D	4.95 (At Planting) 3.0 (Post-Emergence) 4.05 (Post-Emergence) 2.1 (At Planting)* 2.1 (Side Dress)*	4.95 ^A 4.2* ^A	14	at-plant: in furrow, incorporated band or T- band post-emergent: in furrow, incorporated side band or side dress	[CO, ID, MT, NE, OR, WA, WY only] *[CA only]
Sweet Potatoes ^E	3.0	3.0 ^A	0	pre-plant or at-plant: band covered by hilling	LA, MS only

The highest EDWCs are based on the sugar beets use –

Sugar Beets	MN sugar beets	Apr. 15	4.05 (Post Emergence)
-------------	----------------	---------	--------------------------

For the new citrus use, **Deliberative Process / Ex. 5**

Deliberative Process / Ex. 5

The 1 ft and 0.1 ft results from 098301_435243_RTC_12-21-16.doc
New calculations are shown in RED.

Modeled Scenario	Ground-water pH	Max. Daily Conc. (µg/L)
FL Central Ridge	6	100
	7	33
	8	1.25

At pH 6, the k value (degradation rate in aquifer) is 0.00456/day based on the hydrolysis half-life of 152 days. The effects of well setback at different distances are as follows:

Well Setback (ft)	1 ft/day Ground-water Velocity	0.5 ft/day Ground-water Velocity	0.1 ft/day Ground-water Velocity
	Max. Daily Conc. (µg/L)		
50	79.61	63.38	10.23
300	25.46	6.48	1.14E-4
500	10.23	1.046	1.25E-8
700	4.11	0.169	Not calculated
1000	1.05	Not calculated	Not calculated

At pH 7, the k value is 0.011/day based on the hydrolysis half-life of 63 days. The effects of well setback at different distances are as follows:

Well Setback (ft)	1 ft/day Ground-water Velocity	0.5 ft/day Ground-water Velocity	0.1 ft/day Ground-water Velocity
	Max. Daily Conc. (µg/L)		
50	19.04	10.98	0.134
100		3.65	
150		1.22	
175		0.70	
200		0.40	
300	1.22	0.045	1.53E-13
500	0.13	Not calculated	Not calculated
700	1.5E-2	Not calculated	Not calculated
1000	5.5E-4	Not calculated	Not calculated

At pH 8, the k value is 0.1155/day based on the hydrolysis half-life of 6 days. The effects of well setback at different distances are as follows:

Well Setback (ft)	1 ft/day Ground-water Velocity	0.5 ft/day Ground-water Velocity	0.1 ft/day Ground-water Velocity
	Max. Daily Conc. (µg/L)		
50	3.9E-3	1.20E-5	1.03E-25
300	1.1E-11	Not calculated	Not calculated
500	1.0E-25	Not calculated	Not calculated
700	9.5E-36	Not calculated	Not calculated
1000	8.4E-51	Not calculated	Not calculated

From: Wentte, Stephen <Wentte.Stephen@epa.gov>
Sent: Thursday, September 05, 2019 2:02 PM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>
Cc: Lin, James <lin.james@epa.gov>
Subject: RE: aldicarb GW numbers

I think everything you said is fine for assessing citrus. However,

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Thursday, September 05, 2019 1:47 PM
To: Wentte, Stephen <Wentte.Stephen@epa.gov>
Subject: RE: aldicarb GW numbers

I know we discussed you doing it, but since he started the conversation, I thought I would just answer him so he knew where I stood on it. Please add or correct anything I've said in the email below.

From: Wentte, Stephen <Wentte.Stephen@epa.gov>
Sent: Thursday, September 05, 2019 1:46 PM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>
Subject: RE: aldicarb GW numbers

Thanks for sending.

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Thursday, September 05, 2019 11:55 AM
To: Lin, James <lin.james@epa.gov>; Arnold, Elyssa <Arnold.Elyssa@epa.gov>
Cc: Wentte, Stephen <Wentte.Stephen@epa.gov>
Subject: RE: aldicarb GW numbers

Hi Jim,

Yes, I agree that we should

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

I don't want to get too deep in the weeds yet and explore other additional refinements characterizations. Let's run the numbers and see where we are and can share them with HED and the team. I'm interested in what the usage and PCT discussions bear.

Thanks,
Amy

From: Lin, James <lin.james@epa.gov>
Sent: Thursday, September 05, 2019 10:23 AM

To: Arnold, Elyssa <Arnold.Elyssa@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>

Cc: Wente, Stephen <Wente.Stephen@epa.gov>

Subject: RE: aldicarb GW numbers

I did **Deliberative Process / Ex. 5** should be explored.

From: Arnold, Elyssa <Arnold.Elyssa@epa.gov>

Sent: Thursday, September 05, 2019 10:21 AM

To: Blankinship, Amy <Blankinship.Amy@epa.gov>

Cc: Lin, James <lin.james@epa.gov>; Wente, Stephen <Wente.Stephen@epa.gov>

Subject: aldicarb GW numbers

see page 6

Elyssa Arnold, Risk Assessment Process Leader
Environmental Risk Branch 2
Environmental Fate & Effects Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0236
arnold.elyssa@epa.gov